

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: SALAHUDIN SHAHRIAR and	:	CHAPTER 13
SHAGORIKA SHAHRIAR	:	
Debtor(s)	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
SALAHUDIN SHAHRIAR and	:	
SHAGORIKE SHAHRIAR	:	
Respondent(s)	:	CASE NO. 1-21-bk-00790

TRUSTEE’S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 27th day of May, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. Debtor(s)’ plan violates 11 U.S.C. Sec. 1322(a)(2) in that the debtor(s) has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. Sec. 507. More specifically, Claim #4-2 by the IRS.

2. The Trustee avers that debtor(s)’ plan is not feasible based upon the following:

- a. The plan is inconsistent with Proofs of Claims filed and/or approved by the Court. More specifically, Claim #1 by PA Department of Revenue.
- b. Secured claims not in plan. More specifically, Claim #1 by PA Department of Revenue.
- c. Plan ambiguous – Over the debt limit for Chapter 13.

3. Trustee avers that debtor(s)’ plan is not feasible and cannot be administered due to the lack of the following:

- a. 2020 Federal Income Tax return.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 8th day of June, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Robert Chernicoff, Esquire  
2320 North Second Street  
P.O. Box 60457  
Harrisburg, PA 17106

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee